

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)
) Chapter 11
)
YELLOW CORPORATION, *et al.*,¹) Case No. 23-11069 (CTG)
)
Debtors.) (Jointly Administered)
)
) **Re: Docket No. 392**

**CERTIFICATION OF COUNSEL REGARDING ORDER (I) AUTHORIZING THE
DEBTORS TO RETAIN AND COMPENSATE PROFESSIONALS UTILIZED IN THE
ORDINARY COURSE OF BUSINESS AND (II) GRANTING RELATED RELIEF**

The undersigned hereby certifies the following:

1. On August 31, 2023, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed the *Motion of Debtors for Entry of an Order (I) Authorizing the Debtors to Retain and Compensate Professionals Utilized in the Ordinary Course of Business and (II) Granting Related Relief* (the “Motion”) [Docket No. 392].
2. Pursuant to the amended notice of hearing [Docket No. 440], the deadline to object to relief on the Motion was September 14, 2023 at 4:00 p.m. Eastern Time.
3. The Debtors received informal comments to the Motion from the Office of the United States Trustee (the “UST”).
4. The Debtors circulated a proposal form of order to the UST, counsel to the Official Committee of Unsecured Creditors, the Junior DIP Lender, the B-2 Lenders, the ABL Agent, the United States Department of the Treasury, the United States Department of Justice, and the UST Tranche A Agent and UST Tranche B Agent (the “Reviewing Parties”).

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of the Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

5. Attached hereto as Exhibit A is a revised proposed form of order (the “Revised Proposed Order”) that has been circulated to the Reviewing Parties, which do not object to entry of the order. Attached hereto as Exhibit B is a redline of the Revised Proposed Order showing changes against the order filed with the Motion.

6. Accordingly, the Debtors respectfully request entry of the Revised Proposed Order at the Court’s earliest convenience.

Dated: September 19, 2023
Wilmington, Delaware

/s/ Laura Davis Jones

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Proposed Co-Counsel for the Debtors and Debtors in Possession